

In re:

TERI GALARDI,  
  
Debtor.

Case No. 22-50035-JPS

Chapter 11

Contested Matter

ASTRID E. GABBE  
  
Movant.

v.

RASHEEDAH MAYS  
  
Respondent.

**NOTICE OF OBJECTION TO ALLOWANCE OF CLAIM NUMBER 106**

ASTRID E. GABBE HAS FILED AN OBJECTION TO YOUR CLAIM IN THIS CASE.

Your claim may be reduced, modified, or eliminated. You should read these documents carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one. If not served with this notice in accordance with the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, a copy of the objection may be obtained upon written request to counsel for the debtor or at the Clerk's office.

If you do not want the court to eliminate or change your claim, then you or your attorney shall file with the court a written response to the objection on or before **September 27, 2023**.

Clerk, U. S. Bankruptcy Court  
Middle District of Georgia  
P. O. Box 1957  
Macon, Georgia 31202

**If a response is filed, a hearing on the objection to your claim shall be held on:  
November 1, 2023 at 11:00 a.m. at the United States Bankruptcy Court  
Courtroom A, 433 Cherry Street, Macon, Georgia 31201.**

If you mail your response to the court for filing, you shall send it early enough so the court will **receive** the response on or before the response date stated above.

Any response shall also be served on the objecting party.

**If you or your attorney does not take these steps, the court may decide that you do not oppose the objection to your claim.**

**Parties should consult the Court's website ([www.gamb.uscourts.gov](http://www.gamb.uscourts.gov)) concerning whether the hearing will be in-person, telephonic, or virtual. Please refer to Administrative Order #145 for more guidance.**

This notice is sent by the undersigned pursuant to L.B.R. 3007-1.

DATED: August 28, 2023.

Jason M. Orenstein  
Attorney for Astrid Gabbe  
1922 Forsyth Street  
Macon, Georgia 31208-4086  
(478) 743-6300; [jmopclaw@yahoo.com](mailto:jmopclaw@yahoo.com)

UNITED STATES BANKRUPTCY COURT

MIDDLE DISTRICT OF GEORGIA

MACON DIVISION

In re:

Case No. 22-50035-JPS

TERI GALARDI,

Chapter 11

Debtor.

\_\_\_\_\_  
ASTRID E. GABBE

Contested Matter

Movant.

v.

RASHEEDAH MAYS

\_\_\_\_\_  
Respondent.

**OBJECTION TO PROOF OF CLAIM NO. 106**

Creditor and Interested Party in the above matter, ASTRID E. GABBE (herein “Gabbe”), hereby files this Objection to Proof of Claim No. 106 asserted by Rasheedah Mays, (herein “Respondent” or “Ms. Mays”) respectfully shows this Court as follows:

1. On January 12, 2022 debtor filed a voluntary petition for relief under Chapter 11. Gabbe and Respondents are creditors/interested parties holding claims against the debtor in the above bankruptcy case.

2. In the years preceding the filing of the debtor’s bankruptcy petition, Gabbe provided legal representation pursuant to a contingency fee agreement with several adult entertainers who worked for the debtor and suffered damages under the Florida Minimum Wage Act and other related statutes. Ms. Mays was one of the Plaintiffs in an action styled *Milner et al. v. Galardi*, Case No. 20-cv-20592-MGC, (the “Milner Litigation”), in the United States District Court for the Southern District of Florida (the “District Court”).

3. Pursuant to a contingency fee agreement between Gabbe and Ms. Mays, Gabbe was entitled to a 35% contingency fee interest in Respondent’s claim against debtor. In accordance with

attorney fee interest in the Mays claim. Said filing is reflected in the Milner docket and a copy is attached hereto as Exhibit 1.

4. On March 21, 2022, Ms. Mays filed Proof of Claim No. 106 in the amount of \$686,578. Said claim reflects the full amount of her claim against the Debtor and includes the contingency fees due.

5. Recognizing this dispute between Gabbe and Mays, on August 3, 2023, the Liquidating Trustee hired outside counsel to file an interpleader action in the Southern District of Florida in order to deposit the first distribution in the registry of the court in Florida. [See *McClendon v. Mays et. al.* Case No. 23-cv-22893-BB].

6. However, the amount to be paid to Gabbe and to Mays still needs to be resolved and can be resolved through the proof of claim objection process.

7. Gabbe's Attorney Charging Lien should be deducted and paid in full from Claim No. 106 filed by Ms. Mays.

WHEREFORE, the Movant requests the following relief:

- (a) That this Objection be sustained;
- (b) That Gabbe's Charging Lien in the amount of \$96,120.92 is to be paid as part of Thompson's Claim 114;
- (c) That the Liquidating Trustee is ordered to pay \$96,120.92 to Gabbe immediately;
- (d) That Claim No. 106 is reduced by \$96,120.92 and then paid directly to Ms. Mays;
- (e) That the Court awards Movant such other and further relief as is just and proper.

This 28th day of August, 2023.

/s/ Jason M. Orenstein  
JASON M. ORENSTEIN  
State Bar # 554302  
Attorney for Astrid E. Gabbe

1922 Forsyth Street  
Macon, GA 31201  
(478) 743-6300  
jason@jmolaw.com

This is to certify that I have on this day electronically filed the foregoing Objection to Proof of Claim No. 114 using the Bankruptcy Court's Electronic Case Filing program which serves the same upon all participants therein who have appeared in the case. In addition, the counsel for Plaintiff has emailed and first class mailed a copy of the foregoing Objection to Proof of Claim No. 106 to Rasheedah Mays at [rasheedahmays@yahoo.com](mailto:rasheedahmays@yahoo.com) and 480 Dasheill Lane, Atlanta, GA 30349.

This 28<sup>th</sup> day of August, 2023.

/s/ Jason M. Orenstein  
JASON M. ORENSTEIN  
State Bar # 554302  
Attorney for Astrid E. Gabbe

1922 Forsyth Street  
Macon, GA 31201  
(478) 743-6300  
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION  
Case No. 20-23230-CIV-CANNON-OTAZO-REYES**

ANGELA MILNER, ET. AL,

Plaintiffs

v.

TERI GALARDI,

Defendant

**NOTICE OF FILING AND ASSERTING CORRECTED AND AMENDED  
CHARGING LIEN BY THE LAW OFFICES OF ASTRID E. GABBE, P.A.  
FOR ATTORNEYS' FEES AND COSTS**

**NOTICE IS GIVEN** that The Law Office of Astrid E. Gabbe, P.A. ("AG") asserts an attorney's charging lien on any judgment, settlement or award to be entered in the above-captioned proceeding, to Plaintiff Rasheedah Mays ("Mays") on all money due from defendant on any such judgment, settlement or award, and any and all assets, property, money or proceeds retained, received or recovered by Mays or any of her assigns in connection with this judgment, settlement or award. This charging lien claims attorneys' fees and costs due AG for legal services rendered to Mays with respect to Defendant Galardi. To date, nothing has been paid to the undersigned counsel and the total amount due of \$96,120.92.

Dated: July 11, 2023

**Former Attorneys for Plaintiff**

**Rasheeda Mays**

Astrid E. Gabbe

/s/ Astrid E. Gabbe

The Law Office of Astrid E. Gabbe, P.A.

Florida Bar No. 635383

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**Interested Party**

Astrid E. Gabbe

/s/ Astrid E. Gabbe

The Law Office of Astrid E. Gabbe, P.A.

Florida Bar No. 635383

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Hollywood, FL 33083

Tel. (954) 303-9882

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of foregoing was served via CM/ECF, email and/or First Class U.S. Mail to the parties on the attached service list as indicated on this 11th day of July 2023.

Astrid E. Gabbe

/s/ Astrid E. Gabbe

The Law Office of Astrid E. Gabbe, P.A.

Florida Bar No. 635383

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**SERVICE LIST**

**Served via CM/ECF**

howardbrodskyesq@aol.com

**Served via Email**

Rasheedah Mays

rasheedahmays@yahoo.com